

Davis Community Television, dba Davis Media Access  
1623 Fifth Street, Ste A  
Davis, CA 95616

Federal Communications Commission

*Re: In the Matter of Accessibility of User Interfaces, and Video Programming  
Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking*

Davis Community Television, dba Davis Media Access submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors.

Davis Community Television, dba Davis Media Access is a community media center serving Yolo County, CA. We operate a public access channel; an educational access channel; a low-power FM radio station; and curate three online archives and four websites. Our PEG services are carried via Comcast Cable and AT&T U-verse.

We air over 15,000 hours of locally produced content each year, and another 10,000 hours of sponsored content. Our programming is approximately 20,000 subscribers in Yolo County, CA. Some of our sponsored programs, such as Democracy Now and Language Lessons, contain closed captioning. The onscreen video programming guide of our multi-channel video programming distributor, Comcast, does not provide a label or symbol indicating that these programs have closed captions. It just indicates public, government or education channel.

This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the Moped's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

Our community is also served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number (15, 16 and 17, in our community), with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. In our area, AT&T has three different local jurisdictions, and a total of 9 different PEG channels, on its "channel 99" PEG application. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually

navigate a menu of three different local community jurisdictions and find and press the correct one, and then after that, visually navigate a sub-menu of 9 different PEG channels, and find and press the correct one, to reach our PEG channel.

Moreover, AT&T PEG product's lack of a truly effective "last channel" function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another.

In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, our PEG channels on AT&T's U-verse system.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Autumn Labbé-Renault, Executive Director  
Davis Media Access